

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
1300 I. Street, N.W., Suite 900
Washington, D.C. 20005
Telephone: 202-538-8000
Facsimile: 202-538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Jomaire A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF DEFENDANT GOOGLE
LLC'S ADMINISTRATIVE MOTION TO
SEAL THE COURTROOM FOR
HEARING ON JOINT SUBMISSION
(DKT. 281)**

Referral: Hon. Susan van Keulen, USMJ
Hearing Date: September 30, 2021
Hearing Time: 9:30 A.M.

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. I submit this declaration in support of Google’s Administrative Motion to Seal the
7 Courtroom for Hearing on Joint Submission (Dkt. 281).

8 3. On September 28 and 29, 2021, Google asked Plaintiffs to confirm what protected
9 documents and information they intend to discuss and accordingly stipulate to sealing the courtroom
10 for the September 30, 2021 hearing. Plaintiffs informed Google that they do not oppose the instant
11 motion.

12
13 I declare under penalty of perjury of the laws of the United States that the foregoing is true
14 and correct. Executed in San Francisco, California on September 29, 2021.

15
16 DATED: September 29, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

17
18 By /s/ Jonathan Tse
Jonathan Tse

19 *Attorney for Defendant*
20
21
22
23
24
25
26
27
28